

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

REBECCA MOORE	)	
	)	
Plaintiff	)	
	)	
v.	)	Case No. 7:19CV50
	)	
L SLY TRUCKING, LLC	)	
<b>SERVE:</b> John K. Messersmith, IV, Esq.	)	
901 Moorefield Park Dr., Suite 200	)	
Richmond, VA 23236	)	
	)	
and	)	
	)	
MAURICE DICKEY	)	
<b>SERVE:</b> John K. Messersmith, IV, Esq.	)	
901 Moorefield Park Dr., Suite 200	)	
Richmond, VA 23236	)	
	)	
Defendants	)	

**AMENDED COMPLAINT**

COMES NOW the plaintiff, Rebecca Moore, by counsel, and moves the Court for judgment against the defendants, L Sly Trucking, LLC, and Maurice Dickey.

**JURISDICTION**

Rebecca Moore is a resident and citizen of the State of California and has been at all times relevant to this action.

Defendant Maurice Dickey is currently a resident of Cleveland, Ohio, and at the time of the accident was a resident and citizen of Minneapolis, Minnesota.

L Sly Trucking LLC is a Limited Liability Corporation domiciled in Louisiana with its principal place of business in a state other than California and at the time of the accident was Minnesota.

The amount in controversy, exclusive of interest and costs, exceeds Seventy-Five Thousand Dollars (\$75,000.00). Accordingly, this Court has jurisdiction of this cause pursuant to 28 U.S.C. 1332.

### **FACTS**

1. On February 17, 2017, plaintiff Rebecca Moore was operating her vehicle in a lawful manner on Interstate 81 in Wythe County, Virginia.

2. At the time and place aforesaid, the defendant, Maurice Dickey, was employed by the defendant L Sly Trucking, LLC as its agent, and was operating a truck in the course of his employment.

3. Defendant Dickey unlawfully, recklessly and negligently stopped his truck in the roadway without any warnings to oncoming traffic. Plaintiff crested a hill and came upon the defendant's truck illegally stopped in the roadway. She was unable to stop her vehicle in time and struck the rear of defendant's truck violently.

4. Instead of remaining to give assistance to plaintiff, who was seriously injured in the crash, defendant proceeded with his partially disabled truck northward until he was eventually stopped by the Virginia State Police and charged with various offenses.

5. As a proximate result of the accident described, plaintiff has suffered serious and permanent injuries including substantial medical expenses which are continuing; disability; humiliation; pain; suffering; embarrassment; lost income; and loss of earning capacity.

### **CLAIM**

As a result of the aforesaid negligence defendants are jointly and severally liable to the plaintiff for which she prays for damages in the amount of One Million Dollars (1,000,000.00).

A JURY TRIAL IS DEMANDED.

REBECCA MOORE

By: Arthur P. Strickland  
Of Counsel

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